

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PHOENIX FILMS PROPRIETARY  
LIMITED, an Australian company;  
LEGACY PRODUCTIONS LIMITED, a  
New Zealand company; and WARRIOR  
WITHIN PROPRIETARY LIMITED, an  
Australian company,

Plaintiffs,

v.

AMAZON.COM, INC., a Washington  
corporation; BAKER & TAYLOR, INC., a  
Delaware corporation; INGRAM  
ENTERTAINMENT HOLDINGS, INC., a  
Tennessee corporation; and  
ALLUMINATION FILMWORKS LLC, a  
Delaware limited liability company,

Defendants.

No.

**COMPLAINT FOR DAMAGES  
AND INJUNCTIVE RELIEF**

**DEMAND FOR JURY TRIAL**

COME NOW Plaintiffs Phoenix Films Proprietary Limited, Legacy Productions  
Limited, and Warrior Within Proprietary Limited, by and through their attorneys Meltzer  
Grant LLC, and allege as follows:

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF - 1

MELTZER GRANT LLC  
107 SE WASHINGTON ST. #410  
PORTLAND, OR 97214  
503-345-6912

**PARTIES**

1  
2 1. Plaintiff Phoenix Films Proprietary Limited (“Phoenix”) is an Australian  
3 company doing business internationally, including Japan, New Zealand, Hong Kong, and the  
4 United States. Specifically, Phoenix owns and distributes the documentary film The  
5 Intercepting Fist, which is part of the intellectual property at issue in this lawsuit.

6 2. Plaintiff Legacy Productions Limited (“Legacy”) is a New Zealand company  
7 doing business internationally, including Japan, Australia, Hong Kong, and the United States.  
8 Specifically, Legacy owns and distributes the film Bruce Lee’s Jeet Kune Do, which is part of  
9 the intellectual property at issue in this lawsuit.

10 3. Plaintiff Warrior Within Proprietary Limited (“Warrior Within”) is an Australian  
11 company doing business internationally, including Japan, New Zealand, Hong Kong, and the  
12 United States. Specifically, Warrior Within owns and distributes the documentary film Bruce  
13 Lee: Path of the Dragon (collectively, with Bruce Lee’s Jeet Kune Do and The Intercepting Fist,  
14 the “Films”), which is part of the intellectual property at issue in this lawsuit.

15 4. Both Legacy and Warrior Within are wholly owned subsidiaries of Phoenix.

16 5. Upon information and belief, Defendant Amazon.com, Inc. (“Amazon”) is a  
17 Washington corporation with its principal place of business at 410 Terry Avenue North,  
18 Seattle, Washington 98109-5210.

19 6. Upon information and belief, Defendant Baker & Taylor, Inc. (“Baker &  
20 Taylor”) is a Delaware corporation with its principal place of business at 2550 West Tyvola  
21 Road, Suite 300, Charlotte, North Carolina 28217.

7. Upon information and belief, Defendant Ingram Entertainment Holdings, Inc. (“Ingram”) is a Tennessee Corporation with its principal place of business at Two Ingram Blvd., La Vergne, Tennessee 37089.

8. Upon information and belief, Defendant Allumination Filmworks LLC is a Delaware Limited Liability Company with its principal place of business at 21250 Califa Street, Suite 102, Woodland Hills, California 91367.

### **JURISDICTION AND VENUE**

9. This is a civil action seeking damages and injunctive relief for copyright infringement, falsification of copyright management information, and removal or alteration of copyright management information.

10. Phoenix, Legacy, and Warrior Within are alien plaintiffs.

11. The Court has original subject matter jurisdiction over this action pursuant to the provisions of the Copyright Act of 1976 (the “Copyright Act”), 17 U.S.C. § 101 *et seq*, 28 U.S.C. §§ 1338 (a) and (b), and 28 U.S.C. § 1331.

12. The Court has personal jurisdiction over the Defendants, who have sufficiently continuous, systematic, and routine contacts with Washington to establish such jurisdiction. Wrongful acts of the Defendants alleged herein occurred in and caused injury to Plaintiffs in Washington.

13. Venue in Federal District Court for the Western District of Washington is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and (c).

**BACKGROUND**

14. Plaintiff Legacy is in the business of producing and distributing films, including the documentary film Bruce Lee's Jeet Kune Do. This film is a premium product and a one of a kind work, featuring the only known footage of Bruce Lee describing his groundbreaking Jeet Kune Do philosophy of mixed martial arts.

15. Mr. Lee is a celebrated cultural icon around the world and his image is instantly recognizable.

16. Legacy produced Bruce Lee's Jeet Kune Do in cooperation with and under license from the Estate of Bruce Lee.

17. Bruce Lee's Jeet Kune Do is the subject of copyright protection under the laws of the United States. Legacy registered the work with the United States Copyright Office and received copyright certificate # PA-827-004, effective July 28, 1996. The film contains a copyright notice in its opening credits showing Legacy as the copyright holder, and such copyright notice is also present on the cover of previously authorized reproductions of the film. Attached hereto as Exhibit A is a correct and true copy of the copyright registration.

18. Plaintiff Phoenix is in the business of producing and distributing films, including the film The Intercepting Fist. This documentary film is a premium product and a one of a kind work, featuring behind the scenes and rare footage of Mr. Lee.

19. Phoenix produced The Intercepting Fist in cooperation with and under license from the Estate of Bruce Lee.

1           20.       The Intercepting Fist is the subject of copyright protection under the laws of the  
2 United States. Phoenix registered the work with the United States Copyright Office and  
3 received copyright certificate # PA1-032-415, effective February 27, 2001. This film contains a  
4 copyright notice in its closing credits showing Phoenix as the copyright holder, and such  
5 copyright notice is also present on the cover of previously authorized reproductions of the film.  
6 Attached hereto as Exhibit B is a correct and true copy of the copyright registration.

7           21.       Plaintiff Warrior Within is in the business of producing and distributing films,  
8 including the film Bruce Lee: Path of the Dragon. This documentary film is a premium product  
9 and a one of a kind work, featuring behind the scenes and rare footage of Mr. Lee. Warner Bros.  
10 Entertainment, Inc.'s popular movie review website, rottentomatoes.com, describes Bruce  
11 Lee: Path of the Dragon as "one of the best [documentaries] on Lee" (see  
12 [http://www.rottentomatoes.com/m/path\\_of\\_the\\_dragon/](http://www.rottentomatoes.com/m/path_of_the_dragon/), accessed November 29, 2011, 1:58  
13 pm PST).

14           22.       Warrior Within produced Bruce Lee: Path of the Dragon in cooperation with  
15 and under license from the Estate of Bruce Lee.

16           23.       Bruce Lee: Path of the Dragon is the subject of copyright protection under the  
17 laws of the United States. Warrior Within registered the work with the United States Copyright  
18 Office and received copyright certificate # PA 891-718, effective April 21, 1998. This film  
19 contains a copyright notice in its closing credits showing Warrior Within as the copyright  
20 holder, and such copyright notice is also present on the cover of previously authorized  
21  
22

1 reproductions of the film. Attached hereto as Exhibit C is a correct and true copy of the  
2 copyright registration.

3 24. On or around July 1, 2009, Legacy discovered that a low quality DVD version of  
4 Bruce Lee's Jeet Kune Do had been created, reproduced, imported into the United States, and  
5 sold without authorization.

6 25. Legacy's investigation revealed that Modern Audio Ltd., a Hong Kong  
7 company, had created the videos in Hong Kong, which were later imported and distributed by  
8 a large American home entertainment company. That matter was the subject of a lawsuit in  
9 this Court, Case No. 2:09-cv-1822 RAJ, *Legacy Productions Limited v. U2 Home Entertainment Inc. et*  
10 *al* ("Lawsuit"). The Lawsuit was resolved on September 7, 2010, before trial.

11 26. After the resolution of the Lawsuit, Legacy discovered that Bruce Lee's Jeet  
12 Kune Do continued to be reproduced and distributed without authorization. Further  
13 investigation into these continued distributions also revealed unauthorized reproductions and  
14 distributions of The Intercepting Fist and Bruce Lee: Path of the Dragon.

15 27. On information and belief, Amazon has sold and distributed a yet-to-be  
16 determined number of copies of the Films in Washington and elsewhere, either directly to  
17 consumers, through third party distributors and retailers, or both.

18 28. On information and belief, Baker & Taylor has sold and distributed a yet-to-be  
19 determined number of copies of the Films in Washington and elsewhere, either directly to  
20 consumers, through third party distributors and retailers, or both.

1           29.       On information and belief, Ingram has sold and distributed a yet-to-be  
2 determined number of copies of the Films in Washington and elsewhere, either directly to  
3 consumers, through third party distributors and retailers, or both.

4           30.       On information and belief, Allumination has created, manufactured, sold,  
5 and/or distributed a yet-to-be determined number of copies of the Films in Washington and  
6 elsewhere, either directly to consumers, through third party distributors and retailers, or both.

7           31.       The unauthorized reproduction and distribution of the Films have caused  
8 Legacy, Phoenix, and Warrior Within to suffer damages in Washington.

9  
10       **FIRST CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF BRUCE LEE’S JEET**

11                               **KUNE DO**

12           32.       Plaintiff Legacy incorporates paragraphs 1 through 31 above, as though fully set  
13 forth herein.

14           33.       Legacy holds a valid and exclusive copyright to Bruce Lee’s Jeet Kune Do that is  
15 a subject of this action and that is evidenced by its copyright registration certificate.

16           34.       As set forth above, despite the copyright notice in the opening credits of the film  
17 and on the product packaging of authorized and unauthorized copies of the film, Defendant  
18 Amazon willfully distributed copies of Bruce Lee’s Jeet Kune Do without Legacy’s  
19 authorization.

20           35.       Legacy first sent legal notice of copyright infringement to Amazon on July 13,  
21 2009.

1           36.       On July 20, 2009, Amazon's Copyright/Trademark Agent, Adrian Garver, wrote  
2 that Amazon was in the process of removing "Bruce Lee's Jeet Kune Do" from Amazon.com.

3           37.       On July 24, 2009, and again on September 16, 2009, Legacy formally requested  
4 further information from Amazon regarding the infringement, but received no response.

5           38.       Although Legacy believed that its Lawsuit against U2 Home Entertainment had  
6 resolved the infringements, Legacy discovered that Amazon continued to sell an unauthorized  
7 version of Bruce Lee's Jeet Kune Do with reckless disregard to Legacy's copyright.

8           39.       Accordingly, Legacy again sent legal notice of copyright infringement to  
9 Amazon and one of its sellers, Clyde Parks, on January 4, 2011.

10          40.       On January 5, 2011, Amazon's Copyright/Trademark Agent, Adrian Garver,  
11 again wrote that Amazon was in the process of removing the film.

12          41.       Garver further wrote that Bruce Lee's Jeet Kune Do "was supplied by the  
13 distributors Baker & Taylor, Ingram and Allumination filmworks [sic]."

14          42.       The actions and conduct by Defendant Amazon infringe upon Legacy's  
15 exclusive 17 U.S.C. § 106 rights.

16          43.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
17 501 and 17 U.S.C. § 602(a).

18          44.       As a result of the copyright infringement described above, Legacy is entitled to  
19 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
20 costs and attorney's fees, and prejudgment interest.



1           45.       As set forth above, despite the copyright notice in the opening credits of the film  
2 and on the product packaging of authorized and unauthorized copies of the film, Defendant  
3 Baker & Taylor willfully distributed copies of Bruce Lee's Jeet Kune Do without Legacy's  
4 authorization.

5           46.       After investigating and confirming Baker & Taylor's illegal actions, Legacy first  
6 sent legal notice of copyright infringement to Baker & Taylor on September 10, 2009. Baker &  
7 Taylor did not respond.

8           47.       Although Legacy believed that its Lawsuit against U2 Home Entertainment had  
9 resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that Baker  
10 & Taylor continued to distribute Bruce Lee's Jeet Kune Do without Legacy's authorization.

11           48.       On January 24, 2011, Legacy again sent legal notice of copyright infringement to  
12 Baker & Taylor. Again, Baker & Taylor did not respond.

13           49.       The actions and conduct by Defendant Baker & Taylor infringe upon Legacy's  
14 exclusive 17 U.S.C. § 106 rights.

15           50.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
16 501 and 17 U.S.C. § 602(a).

17           51.       As a result of the copyright infringement described above, Legacy is entitled to  
18 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
19 costs and attorney's fees, and prejudgment interest.

1           52.       As set forth above, despite the copyright notice in the opening credits of the film  
2 and on the product packaging of authorized and unauthorized copies of the film, Defendant  
3 Ingram willfully distributed copies of Bruce Lee's Jeet Kune Do without Legacy's authorization.

4           53.       In the course of its investigation, Legacy received correspondence from John J.  
5 Fletcher, counsel for Ingram, on September 11, 2009. In his correspondence, Mr. Fletcher  
6 wrote that while Ingram had purchased its copies from various distributors, it would no longer  
7 make the film available for purchase.

8           54.       Although Legacy believed that its Lawsuit against U2 Home Entertainment had  
9 resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that  
10 Ingram continued to distribute Bruce Lee's Jeet Kune Do without Legacy's authorization and  
11 in reckless disregard of Legacy's copyright.

12           55.       The actions and conduct by Defendant Ingram infringe upon Legacy's exclusive  
13 17 U.S.C. § 106 rights.

14           56.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
15 501 and 17 U.S.C. § 602(a).

16           57.       As a result of the copyright infringement described above, Legacy is entitled to  
17 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
18 costs and attorney's fees, and prejudgment interest.

19           58.       As set forth above, despite the copyright notice in the opening credits of the film  
20 and on the product packaging of authorized and unauthorized copies of the film, Defendant  
21  
22

1 Allumination willfully reproduced (or caused to be reproduced) and distributed copies of Bruce  
2 Lee's Jeet Kune Do without Legacy's authorization.

3 59. Although Legacy believed that its Lawsuit against U2 Home Entertainment had  
4 resolved the infringements, Legacy received notice from Amazon on January 5, 2011, that  
5 Allumination was distributing Bruce Lee's Jeet Kune Do without Legacy's authorization.

6 60. Legacy sent formal legal notice of copyright infringement to Allumination on  
7 January 24, 2011.

8 61. Although Legacy sought to resolve this matter outside of Court, Allumination  
9 denied that it distributed Bruce Lee's Jeet Kune Do.

10 62. The actions and conduct by Defendant Allumination infringe upon Legacy's  
11 exclusive 17 U.S.C. § 106 rights.

12 63. Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
13 501 and 17 U.S.C. § 602(a).

14 64. As a result of the copyright infringement described above, Legacy is entitled to  
15 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
16 costs and attorney's fees, and prejudgment interest.

17  
18 **SECOND CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF BRUCE LEE:**

19 **PATH OF THE DRAGON**

20 65. Plaintiff Warrior Within incorporates paragraphs 1 through 64 above, as though  
21 fully set forth herein.

1           66.       Warrior Within holds a valid and exclusive copyright to Bruce Lee: Path of the  
2 Dragon that is a subject of this action and that is evidenced by its copyright registration  
3 certificate.

4           67.       Bruce Lee: Path of the Dragon was previously reproduced and distributed with  
5 authorization in the United States by United American Video in VHS and DVD formats.

6           68.       As set forth above, despite the copyright notice in the closing credits of the film  
7 and on the product packaging of authorized copies of the film, Defendant Allumination  
8 willfully reproduced (or caused to be reproduced) and distributed copies of Bruce Lee: Path of  
9 the Dragon without Warrior Within's authorization.

10          69.       Although Warrior Within, through its parent company Phoenix Films, sought to  
11 resolve this matter outside of Court, Allumination denied that it reproduced or caused to be  
12 reproduced and distributed copies of Bruce Lee: Path of the Dragon.

13          70.       The actions and conduct by Defendant Allumination infringe upon Warrior  
14 Within's exclusive 17 U.S.C. § 106 rights.

15          71.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
16 501 and 17 U.S.C. § 602(a).

17          72.       As a result of the copyright infringement described above, Warrior Within is  
18 entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages,  
19 statutory costs and attorney's fees, and prejudgment interest.

1           73.       As set forth above, despite the copyright notice in the closing credits of the film  
2 and on the product packaging of authorized copies of the film, Defendant Amazon willfully  
3 distributed copies of Bruce Lee: Path of the Dragon without Warrior Within's authorization.

4           74.       The actions and conduct by Defendant Amazon infringe upon Warrior Within's  
5 exclusive 17 U.S.C. § 106 rights.

6           75.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
7 501 and 17 U.S.C. § 602(a).

8           76.       As a result of the copyright infringement described above, Warrior Within is  
9 entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages,  
10 statutory costs and attorney's fees, and prejudgment interest.

11           77.       As set forth above, despite the copyright notice in the closing credits of the film  
12 and on the product packaging of authorized copies of the film, Defendant Baker & Taylor  
13 willfully distributed copies of Bruce Lee: Path of the Dragon without Warrior Within's  
14 authorization.

15           78.       The actions and conduct by Defendant Baker & Taylor infringe upon Warrior  
16 Within's exclusive 17 U.S.C. § 106 rights.

17           79.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
18 501 and 17 U.S.C. § 602(a).

19           80.       As a result of the copyright infringement described above, Warrior Within is  
20 entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages,  
21 statutory costs and attorney's fees, and prejudgment interest.

1           81.       As set forth above, despite the copyright notice in the closing credits of the film  
2 and on the product packaging of authorized copies of the film, Defendant Ingram willfully  
3 distributed copies of Bruce Lee: Path of the Dragon without Warrior Within's authorization.

4           82.       The actions and conduct by Defendant Ingram infringe upon Warrior Within's  
5 exclusive 17 U.S.C. § 106 rights.

6           83.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
7 501 and 17 U.S.C. § 602(a).

8           84.       As a result of the copyright infringement described above, Warrior Within is  
9 entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages,  
10 statutory costs and attorney's fees, and prejudgment interest.

11  
12                   **THIRD CAUSE OF ACTION—COPYRIGHT INFRINGEMENT OF THE**  
13                   **INTERCEPTING FIST**

14           85.       Plaintiff Phoenix incorporates paragraphs 1 through 84 above, as though fully set  
15 forth herein.

16           86.       Phoenix holds a valid and exclusive copyright to The Intercepting Fist that is a  
17 subject of this action and that is evidenced by its copyright registration certificate.

18           87.       The Intercepting Fist was previously reproduced and distributed with  
19 authorization in the United States by United American Video in VHS and DVD formats.

20           88.       As set forth above, despite the copyright notice in the closing credits of the film  
21 and on the product packaging of authorized copies of the film, Defendant Allumination  
22

1 willfully reproduced (or caused to be reproduced) and distributed copies of The Intercepting  
2 Fist without Phoenix's authorization.

3 89. Although Phoenix sought to resolve this matter outside of Court, Allumination  
4 denied that it reproduced or caused to be reproduced and distributed copies of The  
5 Intercepting Fist.

6 90. The actions and conduct by Defendant Allumination infringe upon Phoenix's  
7 exclusive 17 U.S.C. § 106 rights.

8 91. Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
9 501 and 17 U.S.C. § 602(a).

10 92. As a result of the copyright infringement described above, Phoenix is entitled to  
11 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
12 costs and attorney's fees, and prejudgment interest.

13 93. As set forth above, despite the copyright notice in the closing credits of the film  
14 and on the product packaging of authorized copies of the film, Defendant Amazon willfully  
15 distributed copies of The Intercepting Fist without Phoenix's authorization.

16 94. The actions and conduct by Defendant Amazon infringe upon Phoenix's  
17 exclusive 17 U.S.C. § 106 rights.

18 95. Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
19 501 and 17 U.S.C. § 602(a).

1           96.       As a result of the copyright infringement described above, Phoenix is entitled to  
2 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
3 costs and attorney's fees, and prejudgment interest.

4           97.       As set forth above, despite the copyright notice in the closing credits of the film  
5 and on the product packaging of authorized copies of the film, Defendant Baker & Taylor  
6 willfully distributed copies of The Intercepting Fist without Phoenix's authorization.

7           98.       The actions and conduct by Defendant Baker & Taylor infringe upon Phoenix's  
8 exclusive 17 U.S.C. § 106 rights.

9           99.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
10 501 and 17 U.S.C. § 602(a).

11          100.       As a result of the copyright infringement described above, Phoenix is entitled to  
12 relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory  
13 costs and attorney's fees, and prejudgment interest.

14          101.       As set forth above, despite the copyright notice in the closing credits of the film  
15 and on the product packaging of authorized copies of the film, Defendant Ingram willfully  
16 distributed copies of The Intercepting Fist without Phoenix's authorization.

17          102.       The actions and conduct by Defendant Ingram infringe upon Phoenix's  
18 exclusive 17 U.S.C. § 106 rights.

19          103.       Such actions and conduct constitute copyright infringement under 17 U.S.C. §  
20 501 and 17 U.S.C. § 602(a).



104. As a result of the copyright infringement described above, Phoenix is entitled to relief, including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

**FOURTH CAUSE OF ACTION—REMOVAL OR ALTERATION OF COPYRIGHT**

**MANAGEMENT INFORMATION**

105. Plaintiffs reincorporate paragraphs 1 – 104 above, as though fully set forth herein.

106. By causing to be placed or placing names and logos on unauthorized copies of The Intercepting Fist and Bruce Lee: Path of the Dragon that it distributed, Defendant Allumination, without authority, intentionally removed or altered copyright management information; distributed copies of The Intercepting Fist and Bruce Lee: Path of the Dragon knowing that copyright management information had been removed or altered; and did so knowing or having reasonable grounds to know that its actions will induce, enable, facilitate, or conceal an infringement.

107. Such actions and conduct constitute the removal or alteration of copyright management information under 17 U.S.C. § 1202(b).

108. As a result of the removal or alteration of copyright management information as described above, Phoenix is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

**FIFTH CAUSE OF ACTION—FALSIFICATION OF COPYRIGHT MANAGEMENT**

**INFORMATION**

109. Plaintiffs reincorporate paragraphs 1 through 108 above, as though fully set forth herein.

110. By causing to be placed or placing names and logos on unauthorized copies of The Intercepting Fist and Bruce Lee: Path of the Dragon that it distributed, Defendant Allumination knowingly and with the intent to enable, facilitate, or conceal infringement, provided false copyright management information and distributed copyright management information that is false.

111. Such actions and conduct constitute the falsification of copyright management information under 17 U.S.C. § 1202(a).

112. As a result of the falsification of copyright management information, Legacy is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorney's fees, and prejudgment interest.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for the following relief:

A. On the First Cause of Action, for an award of Defendants' profits and for actual damages in such amount as may be found, or for statutory damages of not less than \$750 or more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1). Alternatively, for an award of statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. §

1 504(c)(2). And for an order permanently enjoining Defendants from infringing Plaintiff  
 2 Legacy's copyrighted film pursuant to 17 U.S.C. § 502 and for an award of costs and attorney's  
 3 fees pursuant to 17 U.S.C. § 505.

4 B. On the Second Cause of Action, for an award of Defendants' profits and for actual  
 5 damages in such amount as may be found, or for statutory damages of not less than \$750 or  
 6 more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1). Alternatively, for an award of  
 7 statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. §  
 8 504(c)(2). And for an order permanently enjoining Defendants from infringing Plaintiff Warrior  
 9 Within's copyrighted film pursuant to 17 U.S.C. § 502 and for an award of costs and attorney's  
 10 fees pursuant to 17 U.S.C. § 505.

11 C. On the Third Cause of Action, for an award of Defendants' profits and for actual  
 12 damages in such amount as may be found, or for statutory damages of not less than \$750 or  
 13 more than \$30,000 per copy pursuant to 17 U.S.C. § 504(c)(1). Alternatively, for an award of  
 14 statutory damages up to \$150,000 upon a finding of willful infringement pursuant to 17 U.S.C. §  
 15 504(c)(2). And for an order permanently enjoining Defendants from infringing Plaintiff  
 16 Phoenix's copyrighted film pursuant to 17 U.S.C. § 502 and for an award of costs and attorney's  
 17 fees pursuant to 17 U.S.C. § 505.

18 D. On the Fourth Cause of Action, for an award of Allumination's profits and for actual  
 19 damages in such amount as may be found, or for statutory damages of not less than \$2,500 or  
 20 more than \$25,000 per violation pursuant to 17 U.S.C. § 1203(c)(3)(b). And for an order  
 21 permanently enjoining Allumination from removing or altering Plaintiffs' copyright  
 22

1 management information pursuant to 17 U.S.C. § 1203(b)(1) and for an award of costs and  
2 attorney's fees pursuant to 17 U.S.C. §§ 1203(b)(4)-(5).

3 E. On the Fifth Cause of Action, for an award of Allumination's profits and for actual  
4 damages in such amount as may be found, or for statutory damages of not less than \$2,500 or  
5 more than \$25,000 per violation pursuant to 17 U.S.C. § 1203(c)(3)(b). And for an order  
6 permanently enjoining Allumination from falsifying Plaintiffs' copyright management  
7 information pursuant to 17 U.S.C. § 1203(b)(1) and for an award of costs and attorney's fees  
8 pursuant to 17 U.S.C. §§ 1203(b)(4)-(5).

9 F. For prejudgment interest on the amount of the award to Plaintiff;

10 G. And for such other and further relief as the Court deems equitable, proper, and just.

11  
12  
13 DATED: November 30, 2011

14  
15 MELTZER GRANT LLC

16 by /s/ Eric S. Meltzer

17 by /s/ John E. Grant, III

18 Eric S. Meltzer WSBA #40203

19 John E. Grant, III WSBA #39539

20 T: 503-953-1082

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E: john@meltzergrant.com

Attorneys for Plaintiffs

EXHIBIT A

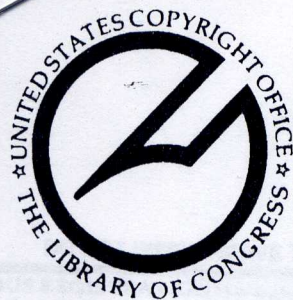
COPYRIGHT CERTIFICATE PA-827-004



## CERTIFICATE OF REGISTRATION

FORM PA

For a Work of the Performing Arts



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

PA 827-004



(PA)

PAU

EFFECTIVE DATE OF REGISTRATION

July 28, 1996

REGISTER OF COPYRIGHTS  
United States of America

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼

BRUCE LEE'S JEET KUNE DO

PREVIOUS OR ALTERNATIVE TITLES ▼

N/A

NATURE OF THIS WORK ▼ See instructions

Instructional video program of one hours duration

2 a NAME OF AUTHOR ▼

LEGACY PRODUCTIONS Limited (New Zealand)

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☒ Yes  
☐ No
AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country
 OR { Citizen of \_\_\_\_\_  
Domiciled in Australia

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

 Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

b NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?

☐ Yes  
☐ No
AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country
 OR { Citizen of \_\_\_\_\_  
Domiciled in \_\_\_\_\_
DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

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 Anonymous? ☐ Yes ☐ No  
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NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

c NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?

☐ Yes  
☐ No
AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country
 OR { Citizen of \_\_\_\_\_  
Domiciled in \_\_\_\_\_
DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

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 Anonymous? ☐ Yes ☐ No  
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1995

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month September Day 15 Year 1995

United States of America

Nation

4 a COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

LEGACY PRODUCTIONS Limited (New Zealand)

PO BOX 134

KENTHURST NSW 2156 AUSTRALIA

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JAN 06 1997

ONE DEPOSIT RECEIVED

July 28, 1996

TWO DEPOSITS RECEIVED

8/6/10

FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

MORE ON BACK ▼

 • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.  
• See detailed instructions  
• Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of \_\_\_\_\_ pages



EXAMINED BY DISE/AP

FORM PA

CHECKED BY

☒ CORRESPONDENCE  
YesFOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

some words, photographs and footage.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

all other cinematographic material

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

LEGACY PRODUCTIONS LIMITEDPO BOX 134KENTHURST NSW 2156AUSTRALIA

Area Code and Daytime Telephone Number ▶

Fax Number ▶

CERTIFICATION\* I, the undersigned, hereby certify that I am the

Check only one ▼

☒ author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Walt MISSINGHAMDate ▶ 27 Dec 1996

Handwritten signature (X) ▼

Walt MissinghamMail  
certificate  
to:

Name ▼

LEGACY PRODUCTIONS LIMITED

Number/Street/Apt ▼

PO BOX 134

City/State/ZIP ▼

KENTHURST NSW 2156AUSTRALIACertificate  
will be  
mailed in  
window  
envelopeYOU MUST:  
• Complete all necessary spaces  
• Sign your application in space 8SEND ALL 3 ELEMENTS  
IN THE SAME PACKAGE1. Application form  
2. Nonrefundable \$20 filing fee  
in check or money order  
payable to Register of Copyrights  
3. Deposit materialMAIL TO:  
Register of Copyrights  
Library of Congress  
Washington, D.C. 20559-6000

\*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

September 1995—100,000

PRINTED ON RECYCLED PAPER

U.S. GOVERNMENT PRINTING OFFICE: 1995-387-237/20,024



EXHIBIT B

COPYRIGHT CERTIFICATE PA1-032-415





This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*  
REGISTER OF COPYRIGHTS  
United States of America

FORM PA  
UNITED STATES COPYRIGHT OFFICE  
REGISTRATION NUMBER

PA 1-032-415  
#PUB001812415

EFFECTIVE DATE OF REGISTRATION

Feb 27 2001  
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

Bruce Lee The Intercepting Fist

PREVIOUS OR ALTERNATIVE TITLES ▼

N/A

NATURE OF THIS WORK ▼ See instructions

Documentary Film of 58 minutes duration

NAME OF AUTHOR ▼

Phoenix Films Pty Ltd

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?  
☒ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of ►  
Domiciled in ► Australia

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No  
If the answer to either of these questions is "Yes" see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

Entire Documentary

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?  
☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of ►  
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☐ No  
Pseudonymous? ☐ Yes ☐ No  
If the answer to either of these questions is "Yes" see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?  
☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of ►  
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☐ No  
Pseudonymous? ☐ Yes ☐ No  
If the answer to either of these questions is "Yes" see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED  
1999  
This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK  
Complete this information Month ► February Day ► 15 Year ► 1999  
has been published. Australia

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Phoenix Films Pty Ltd  
PO Box 134  
Kenthurst NSW 22156 AUSTRALIA

APPLICATION RECEIVED  
SEP 12 2000  
ONE DEPOSIT RECEIVED  
SEP 12 2000  
TWO DEPOSITS RECEIVED

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

REMITTANCE NUMBER AND DATE

MORE ON BACK ►  
• Complete all applicable spaces (numbers 5-9) on the reverse side of this page.  
• See detailed instructions.  
• Sign the form at the end.

DO NOT WRITE HERE

2



EXAMINED BY

B.R.

FORM PA

CHECKED BY

CORRESPONDENCE

Yes

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼☐ This is the first published edition of a work previously registered in unpublished form.☐ This is the first application submitted by this author as copyright claimant.☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

**DERIVATIVE WORK OR COMPILATION** Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

some words, photographs and footage

See instructions  
before completing  
this space

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

all other cinematographic Material

**DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.  
Name ▼ Account Number ▼**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

PHOENIX FILMS PTY LTD

PO BOX 134

KENTHURST NSW 2156

AUSTRALIA

Area Code &amp; Telephone Number ▶

61 2 9679 1742

Be sure to  
give your  
daytime phone  
number**CERTIFICATION** I, the undersigned, hereby certify that I am the

Check only one ▼

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of PHOENIX FILMS PTY LTD

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

WALT MISSINGHAM

date ▶ 3 SEPT 2000

Handwritten signature (X) ▼

Walt Missingham

MAIL  
CERTIFI-  
CATE TOCertificate  
will be  
mailed in  
window  
envelope

Name ▼

PHOENIX FILMS PTY LTD

Number/Street/Apartment Number ▼

PO BOX 134

City/State/ZIP ▼

KENTHURST NSW 2156 AUSTRALIA

**YOU MUST:**

- Complete all necessary spaces
- Sign your application in space 8

**SEND ALL 3 ELEMENTS  
IN THE SAME PACKAGE:**

1. Application form
2. Non-refundable \$10 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

**MAIL TO:**Register of Copyrights  
Library of Congress  
Washington, D.C. 20559

\* 17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

EXHIBIT C

COPYRIGHT CERTIFICATE PA891-718

# FORM PA

UNITED STATES COPYRIGHT OFFICE

PA 891-718



PA 891-718

(PA)

PAU

EFFECTIVE DATE OF REGISTRATION

April 21, 1998

March

Day

Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

PATH OF THE DRAGON

PREVIOUS OR ALTERNATIVE TITLES

N/A

NATURE OF THIS WORK

Documentary film of 43 minutes duration

NAME OF AUTHOR

Warrior Within Pty Limited

Was this contribution to the work a

☒ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of

OR Domiciled in

Australia

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☐ Yes ☒ No

Pseudonymous?

☐ Yes ☒ No

If the answer to either of these questions is "Yes," see questions 7 and 8.

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

Entire Film

NAME OF AUTHOR

Was this contribution to the work a

☐ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of

OR Domiciled in

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes," see questions 7 and 8.

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

Was this contribution to the work a

☐ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of

OR Domiciled in

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes," see questions 7 and 8.

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1998

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

March

Day

Year

1998

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Warrior Within Pty Limited  
PO BOX 134

KENTHURST NSW 2156 Australia

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED

APR 21, 1998

TWO DEPOSITS RECEIVED

REMITTANCE NUMBER AND DATE

DO NOT WRITE HERE

MORE ON BACK

• Complete in applicable spaces (numbers 5-8) on the reverse side of this page.

• See the back of the page.

DO NOT WRITE HERE

2



EXAMINED BY

FORM PA

CHECKED BY

☒ CORRESPONDENCEFOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

5

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- ☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ☐
- ☐ This is the first published edition of a work previously registered in unpublished form.
- ☐ This is the first application submitted by this author as copyright claimant.
- ☐ This is a changed version of the work, as shown by space 6 on this application.
- Your answer is "Yes," give: Previous Registration Number

Year of Registration 

6

DERIVATIVE WORK OR COMPILATION Complete both space 6a &amp; 6b for a derivative work; complete only 6b for a compilation.

See instructions before completing this space

6a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. 

some words, photographs and footage

6b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. 

all other cinematographic material

7

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Account Number THOMSON & THOMSON CRG  
DA 061794CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip Warrior Within Pty Limited  
PO BOX 134  
KENTHURST NSW 2156  
AUSTRALIA

Be sure to give your daytime phone number

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ☐

- ☒ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)
- ☐ authorized agent of

If the work identified in this application and that the statements made to me in this application are correct to the best of my knowledge.

Typed or printed name and date  If this application gives a date of publication in space 2, do not sign and submit it before that date.

WALT MISSINGHAM

date 15 April 1998

Handwritten signature (X) 

Walt Missingham

8

MAIL  
CERTIFICATE TO

Certificate will be mailed in window envelope

Name

WARRIOR WITHIN PTY LIMITED

Number/Street Address/Post Office Box

PO BOX 134

City/State/Zip

KENTHURST NSW 2156 AUSTRALIA

1. Application fee

2. Non-refundable \$10 filing fee on check or money order payable to Copyright Clearance Center, Inc.

3. Payment of Copyright Clearance Center, Inc.

4. Payment of Copyright Clearance Center, Inc.

5. Payment of Copyright Clearance Center, Inc.

6. Payment of Copyright Clearance Center, Inc.

7. Payment of Copyright Clearance Center, Inc.

8. Payment of Copyright Clearance Center, Inc.

9. Payment of Copyright Clearance Center, Inc.

10. Payment of Copyright Clearance Center, Inc.

9

Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 402, or in any written statement filed in connection with the application, shall be fined not more than \$5,000.